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CENTRAL FAX CENTER****AUG 14 2007****REMARKS**

Claims 1-58 remain pending. Claims 8, 28, 38, 45, and 52 have been amended to correct to typographical/grammatical errors. Such amendments do not narrow the scope of the claims.

I. Old Rejections

The rejection of claims 1-27 under 35 U.S.C. § 102(b) based on U.S. Pat. No. 6,021,883 to Casanova et al ("Casanova") has been repeated. It is noted that this rejection has not been applied to claims 28-58.

Applicant respectfully traverses this rejection.

A. Claims 1 and 17

With respect to independent claims 1 and 17, the Office Action states that Figs. 7a-7c of Casanova disclose a compact housing. Applicant respectfully disagrees. Figs. 7a-7c of Casanova disclose a housing having the size of a standard, full-size, floor-standing Automatic Teller Machine (ATM) machine as existed in 1996 when the Casanova application was filed. It is believed that the width, depth, and height of standard ATMs in 1996 at least exceeded two feet. Furthermore, it is apparent from Figs. 7a-7c, that the device disclosed therein is adapted to be used by a person standing in front of the device, and thus, was at least several feet high. Accordingly, Casanova fails to teach or suggest the compact housing recited in independent claims 1 and 17. Accordingly, it is respectfully requested that the pending rejections be withdrawn.

In response, the Final Office Action indicates that the term "compact housing" is a relative term and that "Casanova can be construed to incorporate a 'compact housing' relative to a building, other ATM's or to a myriad of other items." Applicant respectfully traverses this assertion. Rather, Applicant believes that the term "compact housing" must be interpreted in light of the claimed inventions. With respect to claim 1, a "compact housing" must be interpreted in light of the housings for a "cash processing system for processing currency bills and coins" of the type claimed in claim 1. With respect to claim 17, the compact nature of the housing of the cash processing device is explicitly defined as being "adapted to be placed on a

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tabletop." Thus, it is improper to construe "compact housing" relative to a building or a myriad of other items.

B. Claims 2 and 17

With respect to claims 2 and 17, the large floor-standing unit shown in Figs. 7a-7c of Casanova is not adapted to be placed on a tabletop and Casanova contains no such teaching or suggestion. Accordingly, Applicants respectfully traverse the allegation in the Office Action that "any table top of sufficient size would be able accommodate Casanova's apparatus on its top surface."

There is no teaching or suggestion in Casanova for such an arrangement, but rather, such an allegation appears to have been made based solely on the impermissible use of hindsight in light of the disclosure of the present application. Furthermore, the lack of teaching, suggestion or motivation is apparent when it is recognized that placing the large floor-standing unit shown in Figs. 7a-7c of Casanova on a table would render it unusable or impracticable for its intended purpose given that customers would no longer be able to operate the ATM as many components would be out of the reach of the customers such as the bill deposit receptacle 121, the bill withdrawal or return slot 123, customer identification slot 123, *etc.* Finally, it is clear that the large floor-standing unit shown in Figs. 7a-7c of Casanova is adapted to be placed and used while positioned on the floor. As such, it is not "adapted to be placed on a tabletop." Thus, whether the floor-standing unit shown in Figs. 7a-7c of Casanova could potentially be placed on top of a table is beside the point. The floor-standing unit of Casanova is not "adapted to be placed on a tabletop," and hence does not anticipate the system of claim 2 or the method of claim 17. Accordingly, it is respectfully requested that the pending rejections be withdrawn.

Furthermore, the Final Office Action states as "for the requirement that it sit on a tabletop, note again, that a tabletop is a relative term" and cites to an example of 19.5 foot landmark in Anacostia created in the shape of a chair which has a seat as large as two double-sided beds. Such a chair can be construed to perform the same function as a table."

First and foremost, Applicants' note that claims 2 and 17 do not recite that the system or device of those claims "sit on a tabletop." Rather these claims recite that the system of claim 2 and the device used in the method of claim 17 are "adapted to be placed on a tabletop." As

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mentioned above, there can be no question that the floor standing unit of Casanova is not "adapted to be placed on a tabletop." Rather, it is adapted to be placed on the floor so that its controls, *etc.* will be at a convenient level when a customer walks up to and operates the unit while standing. Thus, even if the floor-standing unit shown in Figs. 7a-7c of Casanova were to be hoisted by a crane and placed on top of the 19 ½ foot "chair" in Anacostia, doing so would not change the fact that such a unit is not "adapted to be placed on a tabletop." Likewise, as discussed above, placing the floor-standing unit shown in Figs. 7a-7c of Casanova on top of the 19 ½ foot "chair" in Anacostia would render the unit not useful for its intended purpose as customers would no longer be able to reach and operate the unit. Finally, Applicants' submit that the 19 ½ foot "chair" in Anacostia is a novelty landmark. It is not designed to serve the purpose of a chair for humans as no human is capable of walking up at ground level to this landmark and just sitting down on it. Likewise, the chair is not designed to serve the purpose of a table for humans to use as no human is capable of walking up at ground level to this landmark and even reaching the bottom of the "tabletop," let alone, a device resting on top of it.

C. Claims 3-7 and 19-23

With respect to claims 3 and 19, Casanova fails to teach or suggest a compact housing containing a currency bill processing device and a coin processing device, the compact housing having a width less than about 11 inches.

With respect to claims 4 and 20, Casanova fails to teach or suggest a compact housing containing a currency bill processing device and a coin processing device, the compact housing having a depth less than about 21 inches.

With respect to claims 5 and 21, Casanova fails to teach or suggest a compact housing containing a currency bill processing device and a coin processing device, the compact housing having a height less than about 19 inches.

With respect to claims 6 and 22, Casanova fails to teach or suggest a compact housing containing a currency bill processing device and a coin processing device, the compact housing having a footprint less than about 230 square inches.

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With respect to claims 7 and 23, Casanova fails to teach or suggest a compact housing containing a currency bill processing device and a coin processing device, the compact housing having a volume less than about 4400 cubic inches.

Claims 3-7 and 19-23 stand rejected solely under § 102 based on Casanova. It is undisputed that Casanova does not teach the dimensional limitations of these claims. Accordingly, the anticipation rejection is improper and these claims should be allowed.

Furthermore, there is no teaching or suggestion in Casanova to support the unfounded allegation that the device of Casanova "will still work .. regardless of its size and dimensions." Rather this allegation appears to be based solely on hindsight and as such is improper and impermissible. Accordingly, it is respectfully requested that the pending rejections be withdrawn.

With respect to the statements in the Final Office Action, the record fails to provide any evidence to support the bald allegation that it would have been "well within the skill and creativity of one ordinary skilled in the art to have arrived at Applicants' dimensions based upon market or other requirements." As mentioned above, Figs. 7a-7c of Casanova disclose a housing of the size of a standard, full-size, floor-standing Automatic Teller Machine (ATM) machine. This unit also contains a loose bill dispensing module 133, a strapped bill dispensing module 134, a loose coin dispensing module 136, a rolled coin dispensing module 137, a bill deposit receptacle 121, the bill withdrawal or return slot 123, a customer identification slot 123, a coin deposit receptacle 126, and a coin return pocket 127. There is no teaching or suggestion in Casanova or otherwise in the record that one skilled in the art could or should even attempt to make the unit in Figs. 7a-7c comprising all the components disclosed in Figs. 7a-7c within a housing having any of the claimed dimensions. Likewise, there is no teaching or suggestion or motivation provided in the record for modifying the number of components and particular combination of components within the unit disclosed in Figs. 7a-7c of Casanova and also for modifying the size of the unit so as to arrive at inventions of claims 3-7 and 19-23.

Accordingly, it is respectfully requested that these rejections be withdrawn and these claim allowed.

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II. New Objections and Rejections

A. Objection to term "compact housing"

The term "compact housing" was objected to in claims 1-58 because the term is "a relative term, i.e., compact relative to what."

With respect to independent claims 1 and 17, this objection is addressed above. With respect to claim 28, a "compact housing" must be interpreted in light of the housings for a "cash processing system for processing currency bills and coins" of the type claimed in claim 28.

With respect to claims 2, 17, 29, 38, 45, and 52, these claims recite that the compact housing of the system of claim 2 and the device used in the method of claim 17 is "adapted to be placed on a tabletop." According, the compact nature of the system and device of these claims is defined in terms of being adapted to be placed on a tabletop. Accordingly, the objection to the term "compact housing" as being a relative term is respectfully traversed.

With respect to claims 3, 19, 30, 39, 46, and 53, the compactness of the housing is explicitly defined as a housing having a width less than about 11 inches. Accordingly, the objection to the term "compact housing" as being a relative term is respectfully traversed.

With respect to claims 4, 20, 31, 40, 47, and 54, the compactness of the housing is explicitly defined as a housing having a depth less than about 21 inches. Accordingly, the objection to the term "compact housing" as being a relative term is respectfully traversed.

With respect to claims 5, 21, 32, 41, 48, and 55, the compactness of the housing is explicitly defined as a housing having a height less than about 19 inches. Accordingly, the objection to the term "compact housing" as being a relative term is respectfully traversed.

With respect to claims 6, 22, 33-35, 42, 49, and 56, the compactness of the housing is explicitly defined as a housing having a footprint less than about 230 square inches. Accordingly, the objection to the term "compact housing" as being a relative term is respectfully traversed.

With respect to claims 7, 23, 36, 43, 50, and 57, the compactness of the housing is explicitly defined as a housing having a volume less than about 4400 cubic inches. Accordingly, the objection to the term "compact housing" as being a relative term is respectfully traversed.

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With respect to claims 37, 44, 51, and 58, the compactness of the housing is explicitly defined as a housing having a volume less than about 3000 cubic inches. Accordingly, the objection to the term "compact housing" as being a relative term is respectfully traversed.

With respect to dependent claims 8-16, 18, and 24-27, these claims are allowable for the reasons recited above with respect to the claims from which they depend.

B. § 102(b) Rejections

Claims 28-44 were rejected under § 102 (b) as being anticipated by Geib (U.S. 5,997,395). In this regard, on page 4 of the Final Office Action alleges that Fig. 11 of Geib: includes the same elements except for coin tray (451) found in Applicants' figure 6. Since the same currency processing device is illustrated in Geib figure 11 as is illustrated in Applicants' figure 6, and Applicants' figure 6 is admitted to be an illustration of a compact bill and coin processing device, Applicants' device as claimed in Claims 28-58 are considered anticipated by Geib '395.

This rejection is respectfully traversed. Claims 28-44 contain two independent claims, namely, claims 28 and 38, from which all other claims 29-37 and 39-44 depend. "FIG. 11 [of Geib] is a perspective view of the coin sorter system in use with the manifold of FIG. 10 [of Geib] to place sorted coins in the till of a standard cash register." Geib, col. 2, ll. 62-64 (emphasis added). The entire discussion of Fig. 11 of Geib reveals that it discloses a coin sorter only. See Geib, col. 12, l. 44 - col. 13, l. 16, e.g., col. 12, ll. 55-56 ("once the manifold 220 is attached to the coin sorter 210"); col. 12, ll. 57-59 ("The operator ... then places the coins ... into the coin tray 12 of the coin sorter 10"); col. 12, ll. 59-60 ("The operator then turns on the coin sorter 10"); and col. 13, l. 8 ("the coin sorter system 10").

It is clear from Geib, the coin sorter system of Geib including the coin sorter system illustrated in Fig. 11, does not contain a "currency bill processing device" as recited in the only two independent claims, namely, claims 28 and 38, of claims 28-44. Nothing in the present application can change what Geib discloses. Geib discloses what it discloses. Moreover, nothing in the present application even attempts to characterize what is disclosed by Geib let alone what is disclosed in Fig. 11 of Geib. Accordingly, contrary to the assertion in the Final

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Office Action, the present application does not admit that Geib discloses a device containing a currency bill processing device. Thus, Geib does not anticipate claims 28-44.

Accordingly, withdrawal of this rejection and allowance of claims 28-44 is respectfully requested.

C. § 103 Rejections

Claims 45-58 were rejected under § 103(a) based on Geib in view of Stromme (US 6,311,819). The Final Office Action states that "Geib does not expressly disclose, but Stromme discloses processing bills at a rate of speed of greater than 800 bills per minute." The Final Office Action then concludes that "it would have been obvious to one of ordinary skill in the art to have modified Geib's compact currency processing device to process bills at a rate of 800 or more bills per minute, for the purpose of increasing [the] bill throughput [of Geib]."

This rejection is fatally flawed and hence respectfully traversed. The Final Office Action relies upon Stromme as providing a teaching in the art to increase the bill throughput of the currency bill processing device disclosed in Geib. However, it is clear and can not be disputed that Geib does not teach or suggest any currency bill processing device. Hence, one skilled in the art would not look to Stromme for a way to increase the currency bill processing speed of Geib as Geib is not even directed to a device which processes currency bills in the first place. Geib is directed to device which only processes coins.

Accordingly, withdrawal of this rejection and allowance of claims 45-58 is respectfully requested.

Conclusion

The Applicant believes that the claims are in a condition for allowance and action toward that end is earnestly solicited. If there are any matters which may be resolved or clarified through a telephone interview, the Examiner is respectfully requested to contact the Applicant's undersigned attorney at the number indicated.

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No fees are believed due in connection with this amendment. However, the Commissioner is authorized to charge any fees which may be required in connection with this amendment (excluding the issue fee), or credit any overpayment to Deposit Account No. 50-4181, Order No. 247171-000406USPT

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Respectfully submitted,



Paul R. Kitch
Reg. No.: 38,206
Nixon Peabody LLP
161 N. Clark Street
48th Floor
Chicago, Illinois 60601
312/425-8517
Attorneys for Applicant